



sacramento river
conservation area
forum
a voice for all interests

October 28, 2002

Patrick Wright, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, 11th Floor
Sacramento, CA 95814

Dear Mr. Wright:

The Sacramento River Conservation Area Forum (SRCAF) Board respectfully submits the following comments concerning "Directed Action" proposals located within the SRCAF area of influence.

At the October 17th meeting the SRCAF Technical Advisory Committee (TAC) reviewed "Directed Action" proposals for conformity with the principles and management guidelines set forth in the SRCAF Handbook. The principles provide the foundation for all restoration work to be done in a manner that:

- Uses an ecosystem approach that contributes to the recovery of threatened and endangered species and is sustainable by natural processes,
- Maintains a limited meander where appropriate,
- Works within the parameters of local, state and federal flood control and bank protection,
- Advocates voluntary landowner participation,
- Fully address landowner, public and local government concerns, and
- Provides accurate and accessible information and education that is essential to sound resource management.

The TAC presented the findings to the SRCAF Board of Directors Executive Committee for review and final comments.

Specific Comments:

CALFED Proposal number: 170

Project Proponent: The Nature Conservancy

Title: Restoration of the Confluence Area of the Sacramento River, Big Chico and Mud Creeks

The SRCAF did not see significant changes to this proposal as previously reviewed and presented to the SRCAF Board and TAC. The project was determined to meet the guidelines and principles of the Handbook. However, the SRCAF strongly urges the project proponents to coordinate with Butte County officials concerning ongoing upstream flood issues. Additional coordination should also focus on efforts to find a long-term solution of the M & T Chico

pumping facility (see comments below) and public trespass issues of adjacent landowners. Additional issues include the long-term ownership of the proposed acquisition and coordination of data with ongoing projects in the area.

CALFED Proposal number: 89

Project Proponent: M & T Chico

Title: M & T/Llano Seco Fish Screen Facility

The SRCAF determined that no significant change to the proposal has been made since its original submittal to CALFED for funding. The SRCAF Board supports achieving a long-term solution to the variety of water needs currently served by the pumping facility and has a record of working with the project proponents for some time. However, the Board notes that CALFED has recommended the formation of a Steering Committee to provide input to resolve this matter and strongly urges that these efforts involve the SRCAF. Additionally, the Board also recommends that the SRCAF be a part of any required public outreach component.

CALFED Proposal number: 116

Project Proponent: Reclamation District 108

Title: Reclamation District 108 Consolidated Pumping Facility and Fish Screen

The SRCAF Board determined that the project continues to meet the guidelines and principles of the Handbook as originally submitted to CALFED for funding. The Board is also looking forward to participating in the project proponents planned outreach strategy that includes a session on planning and design of the facility.

CALFED Proposal number: 167/ 171

Project Proponent: The Nature Conservancy

Title: Implementing a Collaborative Approach to Quantifying Ecosystem Flow Regime Needs for the Sacramento Valley and Sacramento River Restoration, Chico Landing Sub-Reach

At the time of the SRCAF review, project proponents relayed that the proposed projects had been granted an extension for re-submittal by CALFED. The SRCAF understands these projects, once re-submitted, will be followed by a 30-day comment period.

Overall Comments and Suggestions:

The SRCAF Board and TAC offers the following suggestions to improve CALFED's objective of local and regional coordination by incorporating the following suggestions in future CALFED ERP Proposal Solicitations and project implementation and design; 1) Increased agency/stakeholder coordination on regional data gathering and sharing, 2) Increased agency communication, 3) Changes to "resubmitted" projects through the Directed Action process be clearly identified, and 4) Increase allotted time for project proponents to develop resubmitted proposals and increase public comment period associated with Directed Actions as well future CALFED program grant solicitations.

- 1) CALFED should facilitate increased agency/stakeholder coordination on regional data gathering and sharing in a format that promotes the easy exchange of data among interested parties. This would decrease the cost of duplicate studies while promoting a comprehensive approach to resource management on a local or regional basis. This could be accomplished in part by establishing a program similar to the "Interagency Ecology Program for the San Francisco Estuary" for the Sacramento Valley region.
- 2) Clear identification of changes to original project submittals that allow interested parties to review the proposals more easily.
- 3) Increase allotted time for project proponents to develop resubmitted proposals and increase public comment period associated with Directed Actions as well future CALFED program grant solicitations.

As previously noted by the SRCAF Board in the original CALFED ERP 2002 PSP process, there was not adequate time allotted to project proponents to allow interested stakeholders to provide comments on project submittals. A normal 30-day comment period does not take into consideration that many stakeholder groups and other organizations meet once a month. Additionally, many project proponents expressed their frustrations with the Directed Action proposal process; in some cases the assignment of an appropriate CALFED liaison to help in addressing selection panel concerns came late in the 30-day period. This late assignment impeded the ability of project proponents to do a sufficient job of addressing CALFED concerns in their original submittal. With some other proposals, we understand project proponents have been given more time to resubmit. While we appreciate the value of flexibility in addressing applicant needs and difficulty of addressing revisions, we are concerned with fairness to all applicants.

Finally, the SRCAF Board appreciates the efforts contributed by your staff in this complex process of grant solicitation, selection and implementation. We offer our comments in a way that enhances your local coordination efforts. We look forward to working with you as the various CALFED programs are implemented now and in the future.

Sincerely,

Jane Dolan
Chairperson

cc: SRCAF Board of Directors
Mary Nichols, Secretary of Resources



November 4, 2002

Dan Ray
CALFED Bay-Delta Program
1416 9th Street, Suite 630
Sacramento, CA 95814

Re: Proposal 89DA: M&T/Llano Seco Fish Screen Facility, Short-Term / Long-Term Protection Project,

Dear Dan,

The Sacramento River Preservation Trust (Trust) would like to submit comments on the M&T/Llano Seco Fish Screen Facility, Short-Term/Long-Term Protection Project Proposal 89DA:

1. The budget for gravel bar engineering and reduction is \$300,000 in Year 1, and \$455,000 in Year 3, with an additional \$25,000 per year (\$75,000 total) for gravel bar monitoring. Is the Year 1 expenditure considered reimbursement for the work that has been done to date? What is the justification for such expenditures in such a short period of time?
2. A cost-share was not identified in the proposal, yet there are significant benefits to the parties promoting this proposal. This is unacceptable. The Trust would recommend a minimum 50% cost-share be required for proposal acceptance.
3. The M&T/Llano Seco Fish Screen Facility (Facility), as originally constructed, had a serious flaw relative to the analysis of river meander. According to the proposal, Montgomery Watson Harza (MWH) was the lead engineer on the design of the Facility and is now being asked to prepare the Long-Term Planning Study. Shouldn't MWH be asked for reimbursement for work performed to date rather than be "rewarded" with additional work under this proposal? The Trust strongly recommends that another firm be chosen, using an open-bid process.
4. The Trust has serious concerns about the continuing removal of gravel bar material while the Long-Term Planning Study takes shape. Additional environmental review should be required of any such activity. The Trust recommends an Environmental Impact Study/Report, as appropriate.
5. The Trust would appreciate being named to the Steering Committee should this proposal be funded.

Thank you for giving us the opportunity to comment. Please feel free to contact us if you have any questions concerning the above.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Merz".

John Merz
Chair, Board of Directors